

Zoya Kovalenko (Cal. SBN 338624)
13221 Oakland Hills Blvd., Apt. 206
Germantown, MD 20874
678 559 4682
zoyavk@outlook.com

Plaintiff Zoya Kovalenko

LYNNE C. HERMLE (STATE BAR NO. 99779)
lchermle@orrick.com
JOSEPH C. LIBURT (STATE BAR NO. 155507)
jliburt@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
Facsimile: +1 650 614 7401

KATE JUVINALL (STATE BAR NO. 315659)
kjuvinall@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
355 S. Grand Ave., Suite 2700
Los Angeles, CA 90071
Telephone: +1 213 629 2020
Facsimile: +1 213 612 2499

MARK THOMPSON (Admitted *pro hac vice*)
mthompson@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
51 W 52nd Street
New York, NY 10019
Telephone: +1 212 506 5000
Facsimile: +1 212 506 5151

Attorneys for Defendants

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C., ADAM
ALPER, ADAM R. ALPER, P.C., AKSHAY
DEORAS, AKSHAY S. DEORAS, P.C., AND
MARK FAHEY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, MICHAEL DE
VRIES, MICHAEL W. DEVRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
AKSHAY DEORAS, AKSHAY S.
DEORAS, P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-cv-05990-HSG (TSH)

**CIVIL LOCAL RULE 6-1(a) STIPULATION
TO EXTEND TIME FOR PLAINTIFF TO
OBJECT/RESPOND TO DEFENDANT
KIRKLAND & ELLIS LLP'S FIRST SETS
OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION**

Assigned to: Hon. Haywood S. Gilliam, Jr.,
Oakland Division
Referred to: Hon. Thomas S. Hixson,
San Francisco Division

1 Plaintiff Zoya Kovalenko (“Plaintiff”) and Defendant Kirkland & Ellis LLP (“Kirkland”)
 2 (collectively, the “Parties”) hereby stipulate under Civil Local Rule 6-1(a) and Federal Rule of
 3 Civil Procedure 29(b) to extend the deadlines for Plaintiff to object/respond to “Defendant
 4 Kirkland & Ellis LLP’s Interrogatories to Plaintiff, Set One” and “Defendant Kirkland & Ellis
 5 LLP’s Request[s] for Production of Documents to Plaintiff, Set One” (collectively, “Kirkland’s
 6 First Sets of Propounded Discovery”) to November 8, 2023. *See* Fed. R. Civ. P. 33(b)(2) &
 7 34(b)(2).

8 Plaintiff’s objections/responses to Kirkland’s First Sets of Propounded Discovery are not
 9 required to be filed or lodged with the Court. *See* Civil L.R. 6-1(a). This stipulated extension will
 10 not alter the date of any event or deadline already fixed by Court order. *See* Civil L.R. 6-1(a); *see*
 11 *also* Fed. R. Civ. P. 33(b)(2) & 34(b)(2); Fed. R. Civ. P. 29(b).¹

12 Dated: October 6, 2023

/s/ Zoya Kovalenko
 Zoya Kovalenko (Cal. SBN 338624)
 13221 Oakland Hills Blvd., Apt. 206
 Germantown, MD 20874
 678 559 4682
 zoyavk@outlook.com

16 Plaintiff

24 ¹ Per the Parties’ earlier Civil Local Rule 6-1(a) stipulation, prior to this stipulation, the deadline
 25 for Plaintiff to object/respond to Kirkland’s First Sets of Propounded Discovery was October 9,
 26 2023. Stip. to Extend Time for Pl. to Object/Respond to Def. Kirkland & Ellis LLP’s First Sets
 27 of Interrogs. and Reqs. for Produc. at 1, Dkt. No. 93. The Parties had agreed to discuss an
 28 additional stipulation, as appropriate. *Id.* at 1 & 1 n.1, Dkt. No. 93. This stipulation follows. As
 Plaintiff apprised the Court during the case management conference held earlier this week,
 Plaintiff and her counsel are still trying to retain local counsel so that Plaintiff’s counsel can apply
 to appear *pro hac vice*. *See* Clerk’s Not. Setting Telephonic Case Management Conference, Dkt.
 No. 97; Minutes re [97], Dkt. No. 99; Civil L.R. 11-3(a).

1 Dated: October 6, 2023

ORRICK, HERRINGTON & SUTCLIFFE LLP

2 /s/ Kate Juvinall

3 KATE JUVINALL

4 kjuvinall@orrick.com

Orrick, Herrington & Sutcliffe LLP

355 S. Grand Ave., Suite 2700

Los Angeles, CA 90071

5 Telephone: +1 213 629 2020

6 Facsimile: +1 213 612 2499

7 LYNNE C. HERMLE (STATE BAR NO. 99779)

lchermle@orrick.com

8 JOSEPH C. LIBURT (STATE BAR NO. 155507)

jliburt@orrick.com

Orrick, Herrington & Sutcliffe LLP

1000 Marsh Road

Menlo Park, CA 94025-1015

10 Telephone: +1 650 614 7400

11 Facsimile: +1 650 614 7401

12 MARK THOMPSON (Admitted *pro hac vice*)

mthompson@orrick.com

13 ORRICK, HERRINGTON & SUTCLIFFE LLP

51 W 52nd Street

New York, NY 10019

14 Telephone: +1 212 506 5000

15 Facsimile: +1 212 506 5151

16 Attorneys for Defendants Kirkland & Ellis LLP,
Michael De Vries, Michael W. DeVries, P.C., Adam
17 Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay
S. Deoras, P.C., and Mark Fahey

18
19 **CIVIL LOCAL RULE 5-1(i)(3) ATTESTATION**

20 Pursuant to Civil Local Rule 5-1(i)(3), I attest that the other signatory has concurred in the
21 filing of this document.

22 Dated: October 6, 2023

/s/ Zoya Kovalenko

23 Zoya Kovalenko (Cal. SBN 338624)

13221 Oakland Hills Blvd., Apt. 206

Germantown, MD 20874

24 678 559 4682

zoyavk@outlook.com

25
26 Plaintiff